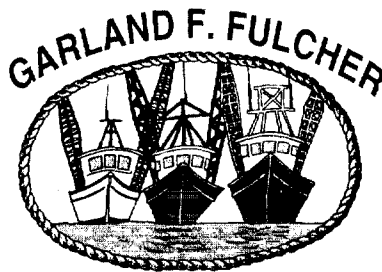


408 Hodges Street
Post Office Box 100
Oriental, North Carolina 28571



SEAFOOD COMPANY, INC.

Sherril Styron
Jeff Styron • Mike Styron
(919) 249-1341

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September 10, 1999

Jane E. Henney
Commissioner
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

Dear Commissioner Henney,

We are writing to urge that the Food and Drug Administration take immediate final action on a proposed seafood labeling rule published more than a year ago. This matter has languished before the FDA for over five years, during which time the lack of a clear labeling rule has contributed to consumer confusion as well as to harm suffered by the U.S. blue crab industry.

Currently, the rules allow crab products to be labeled only as "crabmeat." Such crab meat is generally assumed to be *Callinectes sapidus* (blue crab), historically one of the most common and widely recognized sources of crabmeat in the U.S. However, the rules allow products derived from any of the thousands of crab species found around the world to be labeled "crabmeat" without indicating species or country of origin.

On February 15, 1994, the National Blue Crab Industry Association (NBCIA) filed a petition to ensure clear labeling of blue crab. More than three years later, the FDA published a proposed rule modeled on the NBCIA proposal. By the close of the comment period in July of last year, the FDA had received only ten comments on the proposal, which was supported by a number of industry groups. However, FDA has still not taken action on a final rule.

In the meantime, imports of crab meat from other crab species have more than doubled. Labeling of these imports is misleading to consumers, who cannot distinguish foreign and inferior crabmeats from blue crab. FDA has already noted the recurring misrepresentations of domestic products derived in whole or in part from imported crabmeat. This consumer confusion also undermines the ability of the U.S. blue crab industry to maintain its hard-won place in the market.

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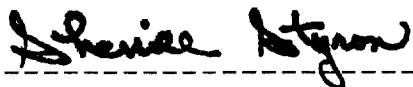
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We strongly urge you to move forward and issue the rule. We see no reason to wait one moment longer for regulations that will help both U.S. consumers and the blue crab industry.

Sincerely,

A handwritten signature in black ink, appearing to read "Sherrill Styron", written over a horizontal dashed line.

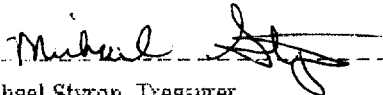
Sherrill Styron, President

Garland F. Fulcher Seafood Company, Inc.

A handwritten signature in black ink, appearing to read "Jeffrey Styron", written over a horizontal dashed line.

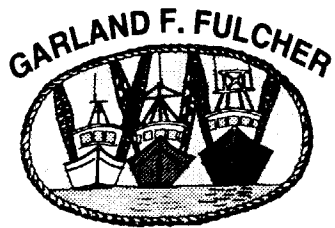
Jeffrey Styron, Secretary

Garland F. Fulcher Seafood Company, Inc.

A handwritten signature in black ink, appearing to read "Michael Styron", written over a horizontal dashed line.

Michael Styron, Treasurer

Garland F. Fulcher Seafood Company, Inc.



SEAFOOD COMPANY, INC.

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Jane E. Henney
Commissioner
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

